

**PAG 208 SCOPE OF WORK TASK FORCE
COMMENTS AND PROPOSED RESPONSES**

Question Number	Question/Comment	Proposed Response	Proposed Location
1.	Because the court findings are not final, describe all assumptions and the impacts of those assumptions if they ultimately are not realized. (p. 4)	The 208 Plan will be modified to note that there is litigation pending – will be added as a statement to the Background Section.	Background Section
2.	How does Marana’s proposal meet the requirement of CWA Sec. 281(c)? (pp. 1 & 33)	Please verify question.	
3.	Marana states that being the DMA will provide the town with effluent ownership within the town boundary. Describe this rationale, particularly when the County is providing treatment services, and compare to existing options for effluent ownership without being a DMA. (p. 4)	See note “B” at the end of this table (p.14). Include in the section a description which discusses the benefits of 100 percent of effluent ownership to properly manage development and growth. Included in the discussion will be the various options presented to the Town for effluent use.	Background Section
4.	It is stated that the 208 Plan Amendment to the PAG Area-wide Water Quality Management Plan is necessary to meet existing and future wastewater treatment needs. Please explain how the County has failed to provide capacity to Marana-area growth? Has Marana discussed regional planning with PCRWRD? (p. 3)	See note “General” at the end of this table (p.14).	Background Section
5.	How will ownership of wastewater be addressed by Marana if the proposed DMA boundary outside the Town boundary is accepted, and includes the transfer of wastewater from Pima County to the Town? (pp. 4, 11 & 12)	See note “D” at the end of this table (p.14). Ownership of the sewage will be decided by the courts.	
6.	Discussion of Pima County effluent quality is not pertinent to this application, is misleading, and does not reflect quality of effluent that will be produced by current upgrades. The surface water quality references effluent data from an unknown period of time and appear to indicate that the effluent provided by PCRWRD do not meet current regulatory requirements but that the treatment facilities constructed by the Town will meet all new regulatory requirements. This is misleading. All RWRD facilities are in compliance with both state and federal regulations and every new treatment facility must meet current BADCT standards in order to be permitted. (p. 10)	Section will be revised for general water quality discussion.	Surface Water Quality

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7.	The Town notes that through implementation of its established goals, having access to increasing effluent supplies, and being in control of it (sic) own destiny, it can provide for responsible community growth. Is the Town stating that to this point they have not had responsible community growth? (p. 11)	See notes "General", "B", and "E" at the end of this table (p.14). My controlling the entire process, the Town will be able to be fully responsible for providing for responsible community growth.	Project Description
8.	Responsible community growth is now a regional topic of discussion. Explain how acquiring control of one's own destiny by seceding from the regional system is a statement of regional cooperation and planning. (p. 11)	See note "E" at the end of this table (p.14). The Town is capable of providing more benefit to the region through ownership and control of effluent supplies by maximizing the direct and beneficial reuse of reclaimed water.	Project Description
9.	Does the Town have a 100 year assured water supply for the 10,000 plus new customers they intend to acquire? (pp. 12, 18 & 19)	Yes. The Town is a member of the Central Arizona Groundwater Replenishment District (CAGR) which provides the 100 year water supply designation.	Background Section
10.	Statements of effluent quality are not consistent within the amendment document. Clarify the planned effluent quality for each facility. (pp. 11 & 30)	Cannot find inconsistency, all references are to A+ Reclaimed Water Quality Standards.	
11.	Describe why the location of a reclamation facility in Pinal County, to treat Pima County wastewater, is beneficial to Pima County. (p. 11)	Reclaimed water will be used in Pima County and within the same sub-basin in the Tucson AMA. Jurisdictional boundaries do not (and, should not) prevent good water management practices.	Project Description
12.	The statement regarding the location and ownership of WWTPs is not clear as to which facilities are located within the Town and which are located within the requested proposed DMA boundary. (pp. 11 & 22)	Text revisions will be made to clarify.	WRF Alternatives Section (pg 22)
13.	What are the available hydro power credits, who owns those credits, how will they be acquired by Marana, and describe how they will be collected and applied at each facility. (pp. 11 & 25)	See note "F" at the end of this table (p.14). Not relevant to the process.	

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14.	The Amendment mentions several features, including a future Barnett Channel, as sewer basin delineators. Provide details on and the location of the Barnett Channel, and include a discussion on why sewer conveyance system design cannot overcome the features' impacts. (p. 13)	See note "A" at the end of this table (p.14). See Sewer Basin Study. The use of these features as a basin boundary is a choice, not an absolute, unsurmountable boundary.	Sewer Basin Study (pg 13)
15.	Do the irrigation canals within the Town provide boundaries for gravity sewer installation, and if yes, identify those impacts and locations. (p. 13)	Agricultural irrigation canals do not present physical limitations to gravity sewage collection systems since sewer lines are installed at depths below the irrigation canal's structure.	Sewer Basins (pg 13)
16.	The population projections are not consistent with the planning approaches of RWRD, Tucson Water, and PAG. Describe the risks, impacts, assumptions, and justification for planning with a different approach than is generally accepted by PAG, Tucson Water and RWRD. (pp. 12 & 17)	The Town's data is based on Town specific planning data that provides the best possible estimate of infrastructure needs; based on the reality of the situation of the Town. These numbers have been compared to PAG projections and are slightly more conservative, typically 12 to 20% higher than PAG population estimates for the same period. In addition, population estimates do not account for commercial and industrial uses that are considered to be a major component of the Town's future growth.	Page 17 ...Projections
17.	Describe why using land-use instead of PAG TAZ data provides more accurate short, medium, and long range growth projections. (p. 12)	See response to question number 16.	
18.	Describe how the 20-year growth numbers were developed from a land-use planning approach. (pp. 12 & 17)	Reference Sewer Basin Study.	Page 17
19.	Growth figures appear to be exaggerated from even the growth rates seen during boom years. Describe in detail how the past growth trends match the short, medium, and long-term growth projections for this plan. (pp. 12 & 17)	See response to question number 16. These are the best available estimates for the Town of Marana based on current development planning from the Town's area.	Page 17
20.	If Basin 24 continues to flow to the Ina Road treatment facility (page 13, bottom of page), is the Town willing to approve of the County providing service within the Town's planning area? (p. 13)	See note "D" at the end of this table (p.14). Subject to future discussions between the Town and PC. Discussion will be added to 208 Plan.	Page 13

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21.	Where does Equivalent Dwelling Unit data come from? (pp. 15 & 17)	Reference Sewer Basin Study.	Section 4, Pages 14 - 19
22.	One acre of commercial land use will produce the same amount of wastewater as four single-family residences. This figure may only be correct for food service type commercial entities and certainly does not represent the current commercial entities that currently operate within the Town's boundaries. In September, 2008, Marana withdrew from TREO because they were unhappy with the lack of commercial development occurring within the Town's boundaries. How does the town plan on generating the amount of commercial development proposed in the plan? (p. 15)	See note "F" at the end of this table (p.14). To the extent this is relevant to the 208 Planning; see SBS, Page 17 and Table 4-4.	WW Flow Projections Page 15
23.	Tables 5 and 6 show a 2013 flow projection of 4.2MGD. Current flows, indicated in Table 2, show flows of approximately 2.83MGD for a difference of 1.3MGD. This equates to a five year population increase of 14,607 persons or 20,968 persons when using either PC or the Town's per capita usage figures. The current population of the Town is 32,300. Justify growth projections from recent historic trends or data. (pp. 18 & 24)	See response to question number 16.	Page 17 ...Projections
24.	The proposed average dry weather flows for the CRRPS and proposed Airport Lift Station shown in this amendment are significantly higher than those for the proposed WRFs to which these lift stations will discharge. Provide a summation of the flow calculations for each WRF tributary basin, including the partial capacities that will be handled by the pump stations. (p. 19)	See note "A" at the end of this table (p.14). Outside scope of 208.	
25.	Marana has used language referring to "taking over the Marana Utility" in regards to wastewater. Identify the description of this utility and what assets are to be taken over with it. (p. 20)	See note "D" at the end of this table (p.14). Language not referenced in the Town's 208 Plan Amendment. The Town of Marana is seeking to be a full water resources	Existing Conditions

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Question Number	Question/Comment	Proposed Response	Proposed Location
25. Cont'd.		service provider within the Town/service area; this includes potable water, wastewater and reclaimed water services for all Town and planning area residents.	
26.	What are the economic factors used to justify closing the Marana WRF instead of utilize the current facility? (p. 20)	See note "D" at the end of this table (p.14). Marana is not proposing immediate closure. See SBS, page 21.	
27.	Lift stations and force mains are mentioned in report but no additional information is provided. Report should include description of locations, capacity, schedule, and cost to construct and operate. (p. 24)	See note "A" at the end of this table (p.14).	
28.	Is Basin 22 added to the 208 Amendment solely for the purpose of eliminating flow through sewers within the proposed DMA planning area? Isn't that inconsistent with the preliminary court order? (p. 21)	See note "D" at the end of this table (p.14). Basin 22 is a "fact of life" that must be dealt with rationally as the Town and Pima County settle their differences.	
29.	Can Basin 22 be included in the Town's 208 Plan Amendment without also being included in its general and/or and specific plans? (p. 21)	See response to question number 28.	
30.	The Town appears to plan on cutting off the flow to the Marana WRF. How does Marana intend to compensate the County for the outstanding debt carried by this facility? (p. 22)	See notes "D" and "F" at the end of this table (p.14).	
31.	The addition of new reclaimed water infrastructure is not adequately addressed. Provide construction sequencing, capital costs, and water balance for use of reclaimed water. (p. 30)	See notes "A" and "C" at the end of this table (p.14). Not a required part of this 208 Plan process. We have complied with Section 5.10 of the existing adopted PAG 208 Areawide Water Quality Management Plan, March 2006. Any facility design will be consistent with the AWQM Plan.	
32.	Does Marana intend to purchase the Marana WRF? (general)	No. See note "D" at the end of this table (p.14).	

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33.	How will the deep incoming lines into the Marana WRF be re-routed to the proposed new northern facility? (general)	See note "A" at the end of this table (p.14).	
34.	The requested DMA boundary does not include the development of Jaguar Lane (Arboles Viejos) outside the Marana boundary, which is designed to flow to the Marana WRF. How does Marana plan on addressing this inconsistency in regional planning? (general)	See notes "A" and "D" at the end of this table (p.14).	
35.	Explain how the Continental Ranch Regional Pump Station (CRRPS).will be modified as identified in the basin study, including costs, scheduled and flow projections. (general)	See note "A" at the end of this table (p.14).	
36.	Include a description and graphics of the current and proposed reclaimed water systems, and provide a 20-year water balance budget for reclaimed water use at each facility. Costs should also be identified for construction and O&M of the system, including recharge basins, through the 20-year planning period. (p. 30)	See note "C" at the end of this table (p.14).	
37.	The topic of reclaimed water is not supported by a discussion of the reclaimed water distribution system. Provide support data on existing and proposed reclaimed water systems and cost to construct and operate. Provide reclaimed water use projections to show how system will utilize the generated reclaimed water. (p. 30)	See note "C" at the end of this table (p.14).	
38.	Provide a map showing the location and expected rate of reuse of reclaimed water for the DMA at 2028 and at buildout. (p. 30)	See note "C" at the end of this table (p.14).	
39.	Describe and provide a cost estimate for the infrastructure necessary to convey the reclaimed water. (p. 30)	See note "C" at the end of this table (p.14). See response to question number 31.	
40.	Provide a water balance for the reclaimed water produced at each of the proposed WRF's. (p. 30)	See notes "A" and "C" at the end of this table (p.14). See response to question number 31.	
41.	Provide a detailed description and cost estimate of the reclaimed water storage facilities will be needed at each of the proposed WRFs. (p. 30)	See note "C" at the end of this table (p.14). See response to question number 31.	

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Question Number	Question/Comment	Proposed Response	Proposed Location
42.	Describe the impacts of proposed sewer system modifications (sewers, lift stations, force mains) on the current system, and provide details on how the system is to be re-configured. Include cost impacts of acquiring the County conveyance system and a schedule of new sewer construction. (p. 30)	See note "A" at the end of this table (p.14).	
43.	The sites of proposed Sandario and County Line WRFs are very close to existing airports, at least one of which is currently handles significant amount of large jet traffic, and the likely use of reclaimed water recharge disposal basins is referenced in the Non-Point Source Issues and Mitigation Procedures section of the draft amendment, during periods where the seasonal landscape irrigation water demands are less than the amount of reclaimed water generated Such basins tend to attract waterfowl, that pose serious in-air hazards to both large and small aircraft. What mitigation measures will be taken at these sites to prevent excessive numbers of birds from flocking to these sites? What will those mitigations measures cost? (pp. 30 & 31)	See note "A" at the end of this table (p.14).	
44.	The Town notes that the debt issued to construct WRF's will be redeemed by a combination of user fees and new development fees. Since existing homes have already paid a connection fee, how does the Town justify billing them through user fees for the replacement of adequate existing treatment and conveyance capacity? (p. 31)	See notes "General" and "B" at the end of this table (p.14). The Town's wastewater rates were developed by an economic consultant who considered repair and replacement costs for existing customers with respect to development of wastewater treatment capacity. We agree that the Town owns capacity in the Marana WTF and in the Ina Road WPCF; based on connection fees paid.	
45.	Develop a conservative growth model based on historical trends to determine if growth will pay for projected capital projects under a conservative scenario. (Marana Permits issued in the noted years show substantial variation: FY2005-1800 permits, FY2006-800 permits, FY2007-500 permits) (p. 31)	See response to question number 44. The impact fees were developed by an economic consultant based on conservative projections of both growth and capital project costs.	

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46.	Describe why the construction of three new facilities and additional pump stations provides a more economical solution to residents for sewer service, and in particular, explain how construction of new facilities to replace existing County capacity is beneficial to rate payers and how it complies with ARS 9-516(A). (p. 31)	See notes "A" and "F" at the end of this table (p.14). Centralized treatment and the centralized distribution of the involved reclaimed water don't allow for maximum beneficial reuse of the effluent; a decentralized approach maximizes the beneficial reuse of water resources.	
47.	Is Marana's designation as a DMA the most economical solution to providing regional wastewater service? Provide the data supporting this conclusion. (p. 31)	Yes. See notes "Genera", "B", and "E" at the end of this table (p.14).	
48.	How does Marana intend to implement their rate plan with existing customers of Pima County wastewater services? (p. 31)	See notes "D" and "F" at the end of this table (p.14). Any time Pima County wants to discuss this and related issues, Marana will be happy to do so.	
49.	How does Marana intend to justify imposing sewer user rates on residents while treatment is currently being provided by Pima County? (p. 31)	See response to question number 48.	
50.	How does Marana plan on entering into service contracts with non-town residents? (p. 31)	See note "D" at the end of this table (p.14).	
51.	Discuss how the proposed ownership switch from Pima County to Marana will impact existing obligations to land owners and developers within the proposed DMA boundary for oversizing credits and connection fees discounts. (p. 31)	Any existing Sewer Service Agreements/obligations within the DMA area will be assumed by the Town of Marana. The Town is prepared to provide the case law on this topic upon request.	
52.	How does Marana plan on resolving contractual issues with the different water provider's interests in effluent ownership treated Within the Town of Marana and the proposed DMA boundary? (p. 31)	See note "F" at the end of this table (p.14).	
53.	Does the Town expect the other water utilities to continue delivering water to their current customers? (p. 31)	Yes. See note "F" at the end of this table (p.14).	

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54.	If biosolids management includes drying beds, the necessary buffers may be much larger than those required for a totally enclosed facility. Please explain how odors will be managed and identify costs for additional buffers. (p. 32)	See note "C" at the end of this table (p.14).	
55.	It is indicated that biosolids will be disposed by landfilling at either Florence or Butterfield. The Florence location does not accept liquid waste therefore the Town would need to thicken the biosolids to at least 25% total solids before acceptance at the landfill. Butterfield is 92 miles from the county line and Cactus is 29 miles from the county line. Provide detailed biosolids management costs, reflecting operation, maintenance, and disposal. (p. 33)	See note "C" at the end of this table (p.14).	
56.	Present a Biosolids Master Plan including sludge processing, cost to transport, and proximity of sludge facilities to planned development should be discussed. The costs of sludge/biosolids handling should be presented as O&M costs. (p. 33)	See note "C" at the end of this table (p.14).	
57.	A conveyance system permit and a certified operator are required by ADEQ. Provide information on the approach and costs associated with operating and maintaining a sewer conveyance system. (p. 34)	See note "General" at the end of this table (p.14). Marana is not aware of a "conveyance system permit" through ADEQ. Marana will be developing a CMOM plan for the involved sanitary sewerage system facilities (conveyance and treatment) in conjunction with Algonquin, the vendor who will be initially utilized for operation and maintenance of the sewage conveyance system.	
58.	Provide additional discussion on the approach to use of the APP permit and the AZPDES permit. Report is not consistent in how these permits will be used. (p. 33)	See note "General" at the end of this table (p.14).	
59.	Executive summary only mentions an APP permit, please elaborate on all ADEQ permits that each facility will obtain and describe the proposed volume of use for each permit. (p. 33)	See notes "General" and "A" at the end of this table (p.14). Permit elaboration not needed in Executive Summary of the plan.	

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60.	A cost-loaded CIP project schedule should be developed for the selected alternative with a tracking curve of projected capacity from selected base-case and conservative alternatives. (p. 35)	Acknowledged. See SBS Section 7. See note "F" at the end of this table (p.14).	
61.	A financial plan should also be provided with this presentation matching growth with income and capital expenditures. Actual dates should be presented in the schedule. (p. 35)	See self certification letter. See note "F" at the end of this table (p.14). Town completed a rate study and impact fee study. These are available for others to review; upon request.	
62.	Additional detail on implementing this plan is required. (p. 36)	We have an implementation schedule in SBS; Section 7, Implementation.	
63.	Discussion of operating a conveyance system is not in this report. Discuss the approach to conveyance O&M and associated costs. (p. 36)	See note "F" at the end of this table (p.14). The CWA does not include conveyance systems; however, the Town is retaining the services of a qualified private entity to perform the required O&M. Thereafter, the Town will equip itself (labor and equipment) to perform the required O&M and any/all related actions in the future.	
64.	Demonstrate that the proposed DMA boundary is comprehensive from a regional perspective and more economic than Pima County service. (p. 36)	See notes "General", "B", and "F" at the end of this table (p.14).	
65.	Is it acceptable to allow for sewage and effluent to leave Pima County (overlapping proposed DMA boundary with Pinal County)? (p. 36)	Sewage already crosses county lines (Eagle Crest) and effluent flows into Pinal County today via the Santa Cruz River.	
66.	Explain why the proposed DMA boundary was established outside the town and why the proposed DMA boundary will provide a more economic wastewater delivery solution than currently being provided by Pima County. (p. 36)	See notes "General" and "F" at the end of this table (p.14).	

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67.	Please explain what voice these customers would have in the Town's operation of a sewage collection and treatment system. (p. 36)	See note "F" at the end of this table (p.14). Town does not intend to extend service into areas outside of the Town boundaries/service area; unless requested to do so.	
68.	Explain the location of the proposed DMA boundary and impacts to the existing Lower Santa Cruz Managed Recharge Project. (p. 36)	The DMA has no relevant impact on the LSCMRP in reference to the proposed DMA boundary.	
69.	What is the basis for extending the service area into Pinal County? (p. 36)	The Town's boundary and planning area extend into Pinal County.	
70.	Why is the proposed DMA boundary greater than the Town Boundary and what is the legal basis for expanding the proposed DMA boundary? (p. 36)	The DMA and Service Area reflect Marana's 2007 General Plan Amendment, a publicly vetted document. The spirit of the 208 is to plan for anticipated growth and therefore the Town is following standard practice. To do otherwise would violate the intent of the CWA.	
71.	How will recharge credits and movement of effluent be handled across AMA and county boundaries? (p. 36)	See note "F" at the end of this table (p.14). This is not relevant to the PAG 208 process, since Pima County is located entirely within the Tucson AMA. Crossing county boundaries is irrelevant. The Town will not recharge effluent across AMA lines until the North Pinal WRF is built; which will not occur for decades. Even then, it will not be an issue because the Town currently intends direct reuse of the effluent from that plant; as opposed to recharge.	
72.	There are several instances within the Town's 208 Plan Amendment that are not in sync with the construction schedule on page 35 (i.e., Appendix A, page 3, 4 th bullet point, Appendix A, page 7, 2 nd bullet point).	Revisions will be made as needed for consistency.	Appendix A, Check List
73.	Appendix A, page 1,2 nd bullet point states that the Marana WRF is located in the Town and all maps provided in the 208 Plan Amendment shows that it is not.	The Marana WRF has been annexed into the Town limits. Corrections will be made as required.	Appendix A, Check List

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74.	Appendix A, page 6, last bullet point notes that proposed methods of financing include taxes. What type of tax does the Town intend to levy?	See note "General" at the end of this table (p.14). The bullet point's text uses the term "may," indicating that taxation is within the Town's authority. All appropriate financing tools will be evaluated by the Town in coordination with its Financing consultants.	
75.	In Appendix C, item (G) the Town assures in implementation of the 208 Plan that each participating community pays its proportionate share of treatment costs. What other communities are they referring to?	See notes "General" and "B" at the end of this table (p.14). The statement in question is taken directly from the Clean Water Act.	
76.	Pima County requested responses to their October 15, 2008 letter.	Responses are hereby provided.	
77.	Pima County requested a summary of the Town's Assured Water Supply Projections and Status.	AWS General Description.	Background Section
78.	Pima County requested a discussion about the Town's rationale for entering the wastewater business.	See notes "General" and "B" at the end of this table (p.14).	Introduction Section
79.	Pima County requested discussion regarding the decentralized vs. centralized approach to wastewater.	See notes "A" and "F" at the end of this table (p.14). Centralized treatment and the centralized distribution of the involved reclaimed water don't allow for maximum beneficial reuse of the effluent; a decentralized approach maximizes the beneficial reuse of all available water resources.	Existing Conditions Section
80.	Pima County requested a discussion on the existing system in the 208 Amendment.	See SBS, Chapter 5	
81.	Pima County requested a discussion of why the current/existing DMA arrangement doesn't work for the Town.	See notes "General" and "B" at the end of this table (p.14).	
82.	Pima County requested an historical timeline for the events leading to the current status.	Acknowledged.	Background

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83.	Pima County requested a summary of the Economics and Financial Planning behind the Town's decision to be in the wastewater business and the regional impacts of this decision.	See notes "General", "B", and "F" at the end of this table (p.14). See rate study.	
84.	City of Tucson requested a discussion be added into the 208 to describe where the water is in the region, including Marana, who serves Marana customers both potable and non-potable water.	Acknowledged.	Existing Conditions
85.	Pima County mentioned they had offered the town an effluent agreement but the Town did not agree to the "SAWRSA tax" that other providers in the region had agreed to.	See notes "General", "B", and "F" at the end of this table (p.14).	
86.	PAG requested additional clarification be added to each of the proposed WRFs to include: floodplain constraints, treatment train, WRF footprints, setbacks, discharge points, lift station and force main locations, and sequence of construction.	See notes "A" and "C" at the end of this table (p.14). General locations only (South proposed WRF's) are proposed – see, for a previous example, the Harrison/Pantano WRF in the existing adopted PAG Area Water Quality Management Plan, Table 2-3, page 5.	
87.	PAG requested discussion about the DMA area currently outside of the existing Town boundaries.	See note "General" at the end of this table (p.14).	
88	Mike Block (Metro) requested that we include direct CAP recharge in area, groundwater level maps, LSCR hydrographs, 100-year flood plain map in General Hydrology section (pgs 8-9).	Acknowledged.	Natural setting
90	PAG (Claire) requested to add section on Habitat/Endangered/Threatened Species.	Acknowledged.	Natural Setting
91	Chris Avery – TW, Make Groundwater and Surface Water descriptions more specific to the existing Marana town limits.	Acknowledged.	Natural Setting

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CATEGORICAL RESPONSES TO THE ABOVE QUESTIONS	
NOTES	CORRESPONDING RESPONSES
General	The Town of Marana is resolved that it must control and utilize any and all water resources available to it in order to more fully determine its destiny. To that end, Town staff has been authorized by its Mayor and Council to pursue the right, ownership, administration and operation of the sanitary sewerage facilities serving Marana's current and future citizens. In furtherance of those goals, this 208 Plan Amendment is submitted to designate the Town as the Designated Management Agency (DMA) for the Town's General Plan planning area and to recognize the proposed locations for future wastewater reclamation facilities (WRFs) to serve the sewage drainage basins positioned in that planning area. The Town acknowledges, recognizes, and accepts responsibility for having to follow through diligently with the bureaucratic, fiscal, and regulatory steps needed for the Town of Marana wastewater system to develop and thrive.
A	The Town of Marana acknowledges the concern prompting this question. However, a detailed response at this point in time is not germane to the issues (DMA designation, recognition of future WRF locations, etc.) properly presented to PAG in connection with this 208 planning process. Instead, the Town acknowledges that it may generate the requested data/information in connection with the preparation and submission of future consistency plans, the concept design processes involved with those plans, future permit applications and/or final WRF design efforts.
B	The Town of Marana's Mayor and Council have made a formal legislative decision to pursue this 208 Plan Amendment and its intended goals; hence, its merits are not eligible for debate and/or re-determination during this 208 Plan Amendment process.
C	The Town recognizes the concern prompting this question; however, it is premature at this stage of the process for the Town to provide this information. A comprehensive Reuse Master Plan, addressing the beneficial and environmentally sound use and reuse of the products (reclaimed water, biosolids, etc.) of the recommended WRFs will be prepared by the Town of Marana for use during the conceptual and final design processes for the WRFs and implemented in the operation of the WRFs.
D	This question is addressed to day-to-day, real life factors affecting the efficient administration, operation and maintenance of the existing sanitary sewerage system serving the Town and its General Plan planning area, and is the subject of pending litigation between the Town of Marana and Pima County which will need to be settled and acceptably resolved, across the table, by reasonable and rational people, with the best interests of the area's health, welfare, destiny and environmental well-being fully in mind.
E	By gaining control of its sanitary sewerage system, the Town of Marana seeks not only to better serve its residents, but also more efficiently to facilitate economic development opportunities that benefit the entire metropolitan Tucson area. Marana can enhance the many resources the Tucson region has to offer to create and attract jobs and industry by reducing the multijurisdictional complexity that many potential employers and developers face when considering relocation to or expansion within the region.
F	This question or comment is not reasonably calculated to address or advance any issue that may be legally or properly considered in determining whether or not to designate the Town of Marana as the Designated Management Agency for the Town's General Plan planning area.